

1 Ángel J. Valencia (D.C. Bar No. 1552471) (*Pro Hac Vice*)
ajv@nrtw.org
2 Milton L. Chappell (D.C. Bar No. 936153) (*Pro Hac Vice*)
mlc@nrtw.org
3 c/o NATIONAL RIGHT TO WORK LEGAL
DEFENSE FOUNDATION, INC.
4 8001 Braddock Road, Suite 600
Springfield, Virginia 22160
5 Telephone: (703) 321-8510

6 Georlen K. Spangler, Esq. (NV Bar No. 3818)
spanglerlaw@outlook.com
7 Stephen A. Davis, Esq. (NV Bar No. 14185)
sdavislaw@outlook.com
8 **The Law Office of Georlen K. Spangler**
2620 Regatta Drive
9 Suite 102
Las Vegas, NV 89128
10 Telephone: (702) 381-5830

11 Attorneys for Plaintiff

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 MELODIE DEPIERRO, an individual,
Plaintiff,

15 v.

16 LAS VEGAS POLICE PROTECTIVE
17 ASSOCIATION METRO, INC., a Nevada non-
profit corporation; and LAS VEGAS
18 METROPOLITAN POLICE DEPARTMENT, a
political subdivision of the State of Nevada,
19 Defendants.

Case No. 20-cv-01481-GMN-VCF

**STIPULATION TO EXTEND THE TIME
TO RESPOND TO DEFENDANT LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT'S MOTION TO DISMISS
(FIRST REQUEST)**

20 **STIPULATION TO EXTEND THE TIME TO RESPOND TO DEFENDANT LAS VEGAS**
21 **METROPOLITAN POLICE DEPARTMENT'S MOTION TO DISMISS**
22 **(First Request)**

23 Plaintiff Melodie DePierro ("DePierro") and Defendant Las Vegas Metropolitan Police
Department ("LVMPD"), by and through their undersigned counsel, hereby stipulate and request
24 that the Court order the deadline for DePierro to file her response to LVMPD's Motion to Dismiss
25 (Dkt. 11, filed on September 23, 2020) be extended and set to October 19, 2020, and that the
26 deadline for LVMPD's reply be set to October 26, 2020, on the following grounds:

- 27 1. On September 23, 2020, LVMPD filed a motion to dismiss DePierro's Complaint (Dkt.
28

- 11). As per Civil Local Rule 7-2, DePierro's current deadline to respond to LVMPD's motion to dismiss is October 7, 2020.
2. On October 5, 2020, Defendant Las Vegas Police Protective Association ("PPA") filed its own motion to dismiss DePierro's Complaint (Dkt. 13). As per Civil Local Rule 7-2, DePierro's deadline to respond to PPA's motion to dismiss is October 19, 2020.
3. DePierro intends to oppose both motions to dismiss. In order to simplify the briefing schedule by allowing DePierro to separately respond to both dispositive motions on the same day, the appearing parties request that DePierro's deadline to respond to LVMPD's motion to dismiss be set to October 19, 2020.
4. Based on this stipulation, the appearing parties request that the Court enter an order granting an extension of time for DePierro to respond to LVMPD's motion to dismiss until October 19, 2020 and October 26, 2020 for LVMPD to reply to DePierro's response in opposition. This is the first stipulation for extension of time to respond to any motion to dismiss. The instant request is being made in good faith without the intention of delaying or affecting the Court's calendar.

IT IS SO STIPULATED.

Dated: October 6, 2020

1 *s/Ángel J. Valencia*
2 Ángel J. Valencia, Esq.
3 (*Pro Hac Vice*)
4 Milton L. Chappell, Esq.
5 (*Pro Hac Vice*)

6 **The Law Office of Georlen K. Spangler**

7 Georlen K. Spangler, Esq. (NV Bar No. 3818)
8 Stephen A. Davis, Esq. (NV Bar No. 14185)

9 Attorneys for Plaintiff Melodie DePierro

10 *s/Nick D. Crosby*
11 Nick. D. Crosby, Esq.
12 Nevada Bar No. 8996
13 10001 Park Run Drive
14 Las Vegas, NV 89145

15 Attorney for Defendant LVMPD
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1 Ángel J. Valencia (D.C. Bar No. 1552471) (*Pro Hac Vice*)
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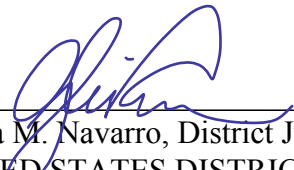
**[PROPOSED] ORDER GRANTING
PLAINTIFF DEPIERRO'S AND
DEFENDANT LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT'S STIPULATION TO
EXTEND THE TIME TO RESPOND TO
THE MOTION TO DISMISS**

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20 After the Court's consideration of the Stipulation to Extend the Time to Respond to
21 Defendant Las Vegas Metropolitan Police Department's (LVMPD) Motion to Dismiss (Dkt. 11),
22 IT IS HEREBY GRANTED.

23 IT IS HEREBY ORDERED that Plaintiff DePierro shall have until October 19, 2020 to file
24 any response to Defendant LVMPD's Motion to Dismiss and Defendant LVMPD shall have until
25 October 26, 2020 to file any reply.

26 **IT IS SO ORDERED.**

27 Dated this 7 day of October, 2020.

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Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT